

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

	X	
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In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	X	

**CERTIFICATION OF JOHN J. RAMIREZ PURSUANT TO  
ORDER GRANTING MOTION TO COMPEL FULL CLAWBACK OF  
DEBTOR'S DOCUMENT PRODUCTION AND RELATED RELIEF**

**JOHN J. RAMIREZ** hereby certifies as follows:

1. I am over the age of 18 and am an attorney with the law firm of Katten Muchin Rosenman LLP ("Katten"), counsel for Deutsche Bank AG, London.
2. In accordance with the *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* (Docket No. 4710) (the "Clawback Order")<sup>1</sup> entered May 13, 2014, Katten caused (a) the Production (*i.e.*, the external hard drive) to be returned on May 13, 2014 to the City's Counsel at 51 Louisiana Avenue, N.W., Washington, DC 20001 *via* overnight delivery; (b) any electronic copies made of the Production, or of any portion thereof, to be purged from Katten's systems and hardware; (c) any physical copies made of the Production or any portion thereof, to be destroyed; and (d) any work-product reflecting the contents of any document in the Production, except that the work-product specifically provided for in paragraph 3 of the Clawback Order, to be destroyed and purged.

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<sup>1</sup> Any capitalized term not defined herein shall have the meaning set forth in the Clawback Order.

3. Accordingly, Katten has complied with each of the provisions of paragraph 2 of the Clawback Order.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed on May 14, 2014, in New York, New York.

/s/ John J. Ramirez

John J. Ramirez